



Independent Distributor

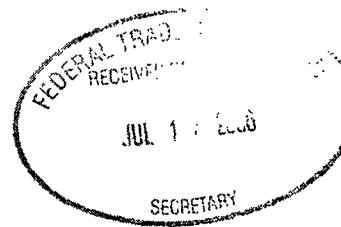
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522418-70704

July 1st, 2006



Federal Trade Commission/Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Business Opportunity Rule, R 511993

Dear Sir or madam:

I am writing to express strong opposition to the proposed Business opportunity Rule R 511993! I understand that the Federal Trade Commission must PROTECT the public from "unfair and deceptive acts or practices," but the rule as proposed would make it very difficult for me at the age of 76 years to operate my business as a Shaklee Independent Distributor! Very difficult!

a most confusing and burdensome section of the proposed rule is the seven-day waiting period to enroll new distributors. Most of the people who sign a Shaklee application are solely consumers of the products - not sellers. Most of them provide only their driver's license number. If they later wish to build a business, they then must provide Shaklee Corporation with their Social Security number or Tax Identification Number. No additional kit fee or application is required! The Shaklee member kit costs only \$19.95. I do not receive any portion of this cost and it covers membership information. This is far less than most consumer purchases such as T.V.'s, household appliances, none of which require a waiting period. Even the purchase of drugs at the drug store do not require a waiting period. Why must there be a waiting period for someone to purchase natural vitamins, herbs and other supplements as well as household cleaners? Are you going to require people to wait a week before they can pick up supplies at the grocery store - -- including Vitamin supplies?

Celebrating 50 years of "Products in Harmony with Nature and Good Health"

The waiting period is also UNNECESSARY in that Shaklee corporation has always had a 100% satisfaction or their money fully refunded - no questions asked!

The proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. People I don't know register as a member and buy products whom I do not know. After they register as a member and purchase products Shaklee notifies me. There is NO WAY I could possibly have access to information as to anyone near them who has purchased products. In this day of identity theft, I am not only uncomfortable giving out personal information of my customers, members or other Shaklee distributors -- I won't without their knowledge or consent -- and it is doubtful they will. I understand that those who sign up should the rule go into effect would be told "If you go into business for yourself in a business opportunity from the seller, your contract information can be disclosed in the future to other buyers." This would surely dissuade new people from becoming distributors as they are concerned not only about their identity theft, but also their privacy invaded.

Providing the 10 references also could damage my business and the businesses of other Shaklee distributors. New distributors would not have these references! Providing a list to a potential recruit, who may be a distributor for a competing direct selling company, may be an invitation to solicit existing distributors for that other opportunity.

The 10 reference requirement would be an administrative nightmare. To obtain the list

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of 10 prior purchasers near to the applicant would be entirely unnecessary anyway because of today's technology people can investigate a company and their products and knowing who else purchases one bottle of vitamins or once a year buys a box of laundry soap - why must his name be given out to strangers?

Shaklee has operated under very high ethical standards for 50 years.

To wait to register as a member and wait a week or two or even more to receive the 10 references so they can buy holiday gifts would surely deter people from patronizing Shaklee.

another burden is the proposed rule that calls for the release of any information regarding lawsuits that allege misrepresentation, or unfair or deceptive practices over a 10 year period. It does not matter if the company was found innocent or not. There are angry, disgruntled people filing suit all the time! a new company operating under unfair or deceptive practices probably would not have any lawsuits against them. it does not make one bit of sense to me that i would have to disclose such lawsuits unless Shaklee corp, or its officers, directors or sales department employees, had been found guilty or liable.

i started my Shaklee business over 12 years ago for the purpose of ① providing a supplemental income to my social security (i have no other retirement income personally) and should my 80 year old husband die before me i will truly need to depend on my Shaklee income so that i don't have to depend on the government to help.

② i became a Shaklee distributor to help others to a higher quality of health and wellness! this all is possible because i can work from my home!

Thank you for considering my comments.
Sincerely,